

EXHIBIT C

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 People of the State of California, et al.

MDL No. 3047

12 v.

Case Nos. 4:23-cv-05448-YGR

13 Meta Platforms, Inc.; Instagram, LLC; Meta
14 Payments, Inc.; Meta Platforms Technologies,
15 LLC,

**DECLARATION OF ALBERT TIBERI
REGARDING UNDUE BURDENS FOR
THE STATE OF HAWAII
DEPARTMENT OF EDUCATION**

16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY
18 PRODUCTS LIABILITY LITIGATION THIS
19 DOCUMENT RELATES TO:

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

4:23-cv-05448

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21 I, Albert Tiberi, hereby declare and state as follows:

22 1. I am an Advisory Services Specialist III for the Office of the Superintendent in the
23 State of Hawaii's Department of Education ("DOE") and make this declaration based on personal
24 knowledge.

25 2. DOE is one of the largest departments for the State of Hawai'i, with around 40,000
26 employees, 258 schools, and over 160,000 students under its umbrella.

27 3. Unlike other states across the country, Hawai'i operates on a single-district school
28 system that is overseen by the State.

1 4. As such, Hawaii's public schools are funded directly and operated by the State, as
2 opposed to being funded by real property taxes and operated by local districts.

3 5. To my knowledge, Hawai'i is the only state in the country with this system.

4 6. Hawaii's unique school system poses a special challenge in responding to
5 Defendant Meta Platforms, Inc.'s ("Meta") deposition topics, particularly for topic numbers 1-6 in
6 Meta's amended Rule 30(b)(6) deposition notice, dated January 21, 2025.

7 7. Each of the over 258 schools may operate or have operated their own social media
8 handles during the Relevant Period set by the notice.


9 8. Each of the over 258 schools may have their own programs, practices, procedures.
10 initiatives, efforts, or actions regarding the use of social media as well.

11 9. To my knowledge, the DOE does not maintain a log of communications by each of
12 the over 258 schools with any social media platforms or third parties, nor do the schools report to
13 DOE on such communications.

14 10. Given the number of schools within DOE's system, attempting to designate a
15 deponent to testify on behalf of all matters concerning DOE will be extremely challenging and
16 burdensome for DOE, especially with the extensive 12-year Relevant Period set by the notice.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on March 17, 2025, in Honolulu, Hawai'i.

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22 Albert Tiberi
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